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U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS

ORIGIN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

OCT - 7 2022

UNITED STATES OF AMERICA

V.

CLERK U.S. DISTRICT COURT
No. 4:22-MJ-83^{By}:

Deputy

MELVIN LADRELLE KELLOUGH JR (1) ATOMIC DIANTHONY GREENE (2)

CRIMINAL COMPLAINT

Conspiracy to Possess a Controlled Substance with Intent to Distribute

Beginning in or before August 2022, and continuing until on or about October 6, 2022, in the Fort Worth Division of the Northern District of Texas, and elsewhere, the defendants, **Melvin Ladrelle Kellough Jr.** and **Atomic Dianthony Greene**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), namely to possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of Fentanyl, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(A)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. On October 6, 2022, investigators assigned to the Fort Worth PD Narcotics section interviewed a Cooperating Defendant (herein after referred to as CD) regarding fentanyl distribution in the Fort Worth area. The CD stated that he/she had been obtaining large quantities (15,000-30,000) of fentanyl pills for several months from a source of supply who was a light skinned black male, who drove a Chrysler 300 vehicle and utilized cellular phone number 682-558-3015. The CD provided a physical description of the source of supply and investigators conducted research on this information.

- 2. Investigators linked the aforementioned telephone number to Melvin Ladrelle Kellough

 Jr. (herein after referred to as Kellough) and identified an associated home address of XXXX

 Terra Brook Street #XXX in Fort Worth, Texas. The CD confirmed that Kellough was the same individual he/she had been obtaining large quantities of fentanyl pills from as outlined above.

 Investigators instructed the CD to contact Kellough by phone and attempt to obtain a quantity of fentanyl pills from him. In the presence of investigators, the CD contacted Kellough at the aforementioned cellular phone number. During this telephone call, Kellough informed the CD that he had approximately 25,000 fentanyl pills that he could deliver to the CD. Kellough further informed the CD that he was going to have his girlfriend bring the fentanyl pills to him (Kellough) as it appeared Kellough was not in possession of the pills at that time. Kellough agreed to deliver the pills to the residence located at XXXXX Park City Trail in Fort Worth,

 Texas, and informed the CD that his cousin would be with him.
- 3. Prior to making the initial call, several investigators traveled to the residence located at XXXX Terra Brook Street #XXX, which was associated with **Kellough**, and established surveillance. At approximately 10:15pm, investigators observed a female, later identified as K.W., exit the apartment carrying several items and several children. K.W. got into a vehicle and departed the location, and investigators followed. Investigators followed K.W. to an apartment complex in Arlington, Texas, where she met with **Kellough**, who was driving a blue Chrysler 300 vehicle. K.W. and **Kellough** then departed the location in their respective vehicles. Investigators believed **Kellough** obtained the fentanyl pills from K.W.
- 4. Investigators stopped surveillance of K.W. and began uninterrupted surveillance of **Kellough**. **Kellough** then contacted the CD by phone and informed him/her that he was Criminal Complaint Page 2

approximately 12 minutes from the meeting location, which matched his current location as investigators were following him. Based on the above information, investigators believed that **Kellough** was in possession of the 25,000 fentanyl pills that were to be delivered to the CD. Members of the FWPD SWAT section were nearby in the neighborhood waiting for **Kellough's** arrival and investigators were conducting surveillance of the residence. **Kellough** then parked across the street from the residence and investigators observed him exit the vehicle and walk towards the residence. Investigators sat **Kellough** carrying a shoebox and other items that were later determined to be a digital scale and a plastic pitcher as he approached the door and began knocking.

- 5. Some members of SWAT then approached **Kellough** and detained him while other members of SWAT approached the Chrysler 300 vehicle and detained **Atomic Dianthony Greene** (herein after referred to as **Greene**) who was seated in the front passenger seat.

 Members of SWAT located a loaded Glock Model 23 .40 caliber handgun in **Kellough's** front waistband area. During a search of the shoebox, investigators located a plastic grocery style sack that contained approximately 25,000 small blue pills with a field weight of 2,500 grams that tested presumptive positive for fentanyl.
- 6. Members of SWAT observed in plain view a loaded American Tactical .223 caliber AR15 style rifle and a loaded Canik 9mm handgun in the front passenger floorboard area where

 Greene was seated. Investigators observed that the front waistband area of Greene's pants
 appeared to be stuffed with something. Investigators asked Greene what he had concealed in the
 front of his pants and Greene said that they were empty plastic baggies and investigators could
 retrieve them. Investigators then retrieved numerous clear plastic baggies containing a powdery
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residue. One of these baggies contained a single fentanyl pill. Investigators conducted a field test of the powdery residue inside one of the bags that was concealed in **Green's** pants, which tested presumptive positive for fentanyl. It appeared that someone had emptied the fentanyl pills from these individual baggies into the larger plastic grocery style sack that contained the approximately 25,000 pills that were in the shoebox.

- 7. FWPD Officer SM Smith #3316 then began collecting personal identifying information from Kellough. Officer Smith asked Kellough what his relationship was to Greene and he said he was a friend. Kellough then corrected himself and said that he was his protection, indicating Kellough brought him along in the event anything went wrong with the fentanyl transaction that they were currently involved in. This was corroborated by the finding of the aforementioned firearms in the care, custody and control of Greene inside the vehicle. Kellough was determined to have \$792 in US Currency on his person and Greene was found to have \$2,762 in US Currency on his person. Based on the above factors, investigators believed that Kellough and Greene were working together to deliver the 25,000 fentanyl pills to the CD.
- 8. Investigators then drafted a search warrant for the residence located at XXXX Terra
 Brook Street #XXX, which was reviewed and signed by Fort Worth Municipal Judge Kelman at
 1:31am on October 7, 2022. Investigators and members of FWPD SWAT then traveled to the
 location and executed the search warrant. Inside the residence was K.W. and her three children.
 During a search of the upstairs master bedroom, investigators found, among other things,
 multiple clear plastic baggies that contained a combined total of approximately 3,000 individual
 small blue pills with a field weight of 304 grams, which tested presumptive positive for fentanyl,
 29 pounds of marijuana, \$100,871 in US Currency and seven firearms.

9. Although I have not listed all the facts regarding the numerous offenses of Melvin Ladrelle Kellough Jr. and Atomic Dianthony Greene, I believe that the facts stated here establish probable cause that Melvin Ladrelle Kellough Jr. and Atomic Dianthony Greene, have committed a violation of 21 U.S.C. § 846, Conspiracy to Possess Fentanyl with the intent to distribute.

> Tyler Sullivan Special Agent

Homeland Security Investigations

SWORN AND SUBSCRIBED before me on this

day of October 2022, at 9:58

pm, in Fort Worth, Texas.

UMITED STATES MAGISTRATE JUDGE